

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

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	)	Docket No. 14-0652
Ameren Illinois Company,	)	
d/b/a Ameren Illinois	)	
	)	
	)	
Petition for an Order Pursuant to Section 8-509 of	)	
The Public Utilities Act Authorizing Use of	)	
Eminent Doman Power	)	

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**DIRECT TESTIMONY OF JEFFREY M. CRAMER  
ON BEHALF OF  
BARBARA CRAMER, TRUSTEE OF THE RICHARD C. CRAMER TRUST**

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CRAMER EXHIBIT 1.0

**November 17, 2014**

1    **Q.     Please state your name and address.**

2    **A.**     My name is Jeffrey M. Cramer and my address is 2110 N. Sleister Lane, Hanna City, IL  
3             61536.

4    **Q.     On whose behalf are you testifying?**

5    **A.**     My testimony is prepared for and on behalf of Barbara Cramer, who is the Trustee of the  
6             Richard C. Cramer Trust. The Trust owns two parcels of real property that are the  
7             subject of this Docket (the "Cramer Property").

8    **Q.     What is your relationship to Mrs. Cramer and the property?**

9    **A.**     Mrs. Cramer is my mother and I am a beneficiary of the Richard C. Cramer Trust. I live  
10            on the family farm very near the Cramer Property. I am very familiar with the Cramer  
11            Property.

12   **Q     What is the purpose of your testimony?**

13   **A.**     The purpose of my testimony is to provide the Commission with information regarding the  
14            negotiations in which the Cramer family has engaged with Ameren, and continues to  
15            engage in with Ameren.

16   **Q.     How long has the Cramer Property been in the Cramer family?**

17   **A.**     The Cramer Property has been in our family for nearly 100 years.

18   **Q.     Has the Cramer family been negotiating with Ameren regarding an easement across**  
19            **the Cramer Property?**

20   **A.**     Yes, our family has been, and continues to be, in discussions with Ameren.

21   **Q.     Have the negotiations been face to face or by correspondence?**

22     **A.**     Both. We have met with an Ameren representative three times. We have also  
23             corresponded with Ameren, primarily through our attorney, Mr. Streeter. Copies of our  
24             pertinent correspondence and documents are filed herewith as follows:  
25             **Exhibit 1.01:** October 21, 2013 letter from Mr. Nelson to Mrs. Cramer  
26             **Exhibit 1.02:** November 7, 2013 email from Mr. Streeter to Mr. Nelson.  
27             **Exhibit 1.03:** November 12, 2013 email from Ameren representative Dave Minnick to  
28             Mr. Streeter.  
29             **Exhibit 1.04:** December 2, 2013 email from Mr. Streeter to Mr. Minnick.  
30             **Exhibit 1.05:** January 13, 2014 email from Ameren representative C.W. Grotewiel to Mr.  
31             Streeter.  
32             **Exhibit 1.06:** January 16, 2014 email from Mr. Grotewiel to Mr. Streeter.  
33             **Exhibit 1.07:** March 20, 2014 email from Mr. Streeter to Mr. Grotewiel.  
34             **Exhibit 1.08:** March 20, 2014 email from Mr. Grotewiel to Mr. Streeter.  
35             **Exhibit 1.09:** March 31, 2014 email from Mr. Grotewiel to Mr. Streeter.  
36             **Exhibit 1.10:** April 1, 2014 email from Mr. Grotewiel to Mr. Streeter.  
37             **Exhibit 1.11:** April 30, 2014 email from Mr. Grotewiel to Mr. Streeter.  
38             **Exhibit 1.12:** May 14, 2014 email from Mr. Grotewiel to Mr. Streeter.  
39             **Exhibit 1.13:** May 15, 2014 email from Mr. Streeter to Mr. Grotewiel.  
40             **Exhibit 1.14:** May 16, 2014 email from Mr. Grotewiel to Mr. Streeter.  
41             **Exhibit 1.15:** May 20, 2014 email from Mr. Streeter to Mr. Grotewiel.  
42             **Exhibit 1.16:** August 13, 2014 email from Ameren representative Darren Bocox to Mr.  
43             Streeter.

**Exhibit 1.17:** September 23, 2014 email from Mr. Streeter to Mr. Bocox.

**Exhibit 1.18:** October 1, 2014 email from Mr. Bocox to Mr. Streeter (including attached letter).

**Exhibit 1.19:** October 1, 2014 email from Mr. Streeter to Mr. Bocox.

**Exhibit 1.20:** October 2, 2014 email from Mr. Bocox to Mr. Streeter.

**Exhibit 1.21:** September 30 letter from Mr. Bocox to Mr. Streeter regarding the western parcel, P0-93 (received October 2, 2104) (appraisal not included).

**Exhibit 1.22:** September 30 letter from Mr. Bocox to Mr. Streeter regarding the eastern parcel, P0-94 (received October 2, 2104) (appraisal not included).

**Exhibit 1.23:** October 6, 2014 email from Mr. Streeter to Mr. Bocox.

**Exhibit 1.24:** October 16, 2014 email from Mr. Bocox to Mr. Streeter.

**Exhibit 1.25:** October 16, 2014 email from Mr. Streeter to Mr. Bocox.

**Exhibit 1.26:** October 24, 2014 email from Mr. Streeter to Mr. Bocox (with attached letter).

**Exhibit 1.27:** November 5, 2014 email from Mr. Bocox to Mr. Streeter.

**Q. Were there any significant delays in Ameren responding to the Cramer family?**

**A.** Yes. We initially contacted Ameren requesting a meeting during the week of November 11, 2013 (Exhibit 1.02). Apparently due to a change in Ameren representatives, Ameren did not meet with us until April, 2014. (Exhibit 1.10).

**Q. Were there any other significant delays?**

64    **A.**     Yes. After responding to a question from the Ameren representative on May 20, 2014  
65           (Exhibit 1.15), we did not receive Ameren's new proposal until August 13, 2014. (Exhibit  
66           1.16). This new proposal came from yet another Ameren representative.

67    **Q.**     **Prior to the filing of this request for authorization of use of eminent domain power,**  
68           **did the Cramer family receive any correspondence or notification that Ameren**  
69           **considered the negotiations to be at an impasse?**

70    **A.**     No. To the contrary, we provided Ameren with a counter proposal on October 24, 2014  
71           (four days *before* the petition was filed) (Exhibit 1.24). We then received an email from  
72           Ameren's representative, Mr. Bocox, on November 5, 2014 (one week *after* the petition  
73           was filed) stating that Ameren was reviewing our counter proposal and would be  
74           "providing revised papers soon." (Exhibit 1.25).

75    **Q.**     **Does this conclude your direct testimony?**

76    **A.**     Yes it does.